

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MICHAEL TILLMAN
Plaintiff, Pro-Se

JOHN PAUL SMITH
Plaintiff, Pro-Se

DONALD F. BLIZZARD, SR.
Plaintiff, Pro-Se

v.

JOHNSON DIVERSEY, INC.
[Incorrectly identified as "Johnson
Diversay, Inc."]
Defendant.

DOCKET NO: 04-CV-40107-GAO

**MOTION OF THE DEFENDANT,
JOHNSON DIVERSEY, INC.
FOR ADMISSION OF ATTORNEY PRO HAC VICE**

The defendant in the above-captioned matter, JohnsonDiversey, Inc., respectfully moves for the admission *pro hac vice* of Attorney Stephanie M. Keddy to practice in the above-captioned case.

Ms. Keddy is a Shareholder in the law firm of Riordan, Donnelly, Lipinski & McKee, Ltd., 10 North Dearborn Street, Chicago, IL 60602, which coordinates the defense of JohnsonDiversey, Inc. in litigation. As such, Ms. Keddy is closely familiar with the defendant's procedures, practices and products and will be able to enhance and facilitate the presentation of its case without delay or inconvenience to the plaintiffs.

Attached hereto and made part hereof is the Affidavit of Ms. Keddy, affirming that she is a member in good standing of the bars to which she has been admitted.¹

WHEREFORE, the Defendant respectfully asks that its Motion to have Stephanie M. Keddy admitted *pro hac vice* be granted and for such other and further relief as this Court may deem just and proper.

The Defendant
JohnsonDiversey, Inc.,
By its Attorneys,

/s/ Philip M. Hirshberg

Lee Stephen MacPhee-BBO #312400
Philip M. Hirshberg, BBO #567234
MORRISON MAHONEY LLP
250 Summer Street
Boston, MA 02210
(617) 439-7500

¹ The Certificate of Admission to the Bar of Illinois is in the name of Stephanie Michele Connah, which is Stephanie M. Keddy's maiden name.